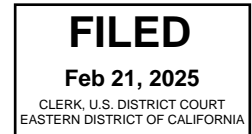


UNITED STATES DISTRICT COURT
for the
Eastern District of California



United States of America
v.
MIGUEL ALBERTO RUIZ-ZAMORA; AKA MIGUEL
ALBERTO RUIZ; AKA MIGUEL RUIZ; AKA LUIS
RUIZ

Case No. 1:25-mj-00012 SAB

Defendant(s)

CRIMINAL COMPLAINT BY RELIABLE ELECTRONIC OR TELEPHONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 1, 2025 in the county of Kern in the
Eastern District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 111(a)(1)

Offense Description

Assault of a Federal Officer or Employee, punishable by imprisonment of not more than eight years, and a fine of up to \$250,000, or both; up to three years of supervised release; \$100 special assessment.

This criminal complaint is based on these facts:

See affidavit of Senior Special Agent Jennfier Doyle, U.S. Immigration and Customs Enforcement, Office of Professional Responsibility, attached hereto and incorporated herein.

☒ Continued on the attached sheet.

Complainant's signature

Jennifer Doyle, ICE OPR Senior Special Agent

Printed name and title

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P.
4.1 by telephone

Date: Feb 21, 2025

City and state: Fresno, California

Judge's signature

Hon. Stanley A. Boone, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ALBERTO RUIZ-ZAMORA,
AKA MIGUEL ALBERTO RUIZ,
AKA MIGUEL RUIZ,
AKA LUIS RUIZ,

Defendant.

CASE NO.

AFFIDAVIT OF AGENT JENNIFER DOYLE IN
SUPPORT OF COMPLAINT

I, Jennifer Doyle, being sworn, depose and state the following:

I. INTRODUCTION

1. I am an Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) Special Agent assigned to the ICE Office of Professional Responsibility (“OPR”) Resident Agent in Charge (“RAC”) Los Angeles office. I have been a Special Agent with HSI since 2012 and assigned to ICE OPR since 2022. I am a graduate of the ICE Homeland Security Investigations Special Agent Training Program as well as the OPR Special Agent Training Program in Glynco, Georgia, and am currently assigned to ICE OPR where I investigate employee misconduct and assaults against ICE employees. During my law enforcement career, I have attended trainings and conducted investigations relating to employee misconduct, assaults against federal officers, persons assisting federal officers, and other areas of law enforcement.

2. This affidavit is in support of a complaint charging MIGUEL ALBERTO RUIZ-ZAMORA with violating 18 U.S.C. § 111(a)(1)D – assaulting, resisting, or impeding persons assisting federal officers or employees. The information set forth in this affidavit is not intended to detail each and every fact and circumstance of the investigation or all the information known to me and other law enforcement investigators. Rather, this affidavit serves only to establish probable cause for the arrest of RUIZ-ZAMORA.

II. APPLICABLE LAW

3. Title 18, United States Code, Section 111(a)(1) states it is unlawful for anyone to assault, resist, oppose, impede, intimidate, or interfere with any person designated as an officer or employee of the United States, or person assisting a federal officer or employee, under section 1114 of Title 18. The Golden State Annex detention center, where this incident occurred, is a United States government immigration detention facility and nurses employed at the facility are private persons assisting federal officers or employees in the performance of federal duties pursuant to contracts with federal agencies.

III. STATEMENT OF PROBABLE CAUSE

4. The Golden State Annex detention center located in McFarland, California is a United States Immigration and Customs Enforcement detention center. It houses persons who are alleged to have violated federal immigration law and is operated under the jurisdiction of the federal government, specifically, by ICE. Employees at the Golden State Annex, including Detention Officers (“DOs”) and medical staff, are private persons assisting federal officers and employees in the performance of federal duties because DO’s and medical staff at Golden State Annex are performing federal services, such as medically treating federal detainees, pursuant to a contract with a federal agency, in this case ICE Enforcement and Removal Operations (“ERO”). Nurse M.C., who is mentioned further therein, is one such private-sector employee assisting federal officers and employees by performing federal medical services pursuant to a contract with ICE ERO.

5. On February 1, 2025, at approximately 8:21 p.m., DOs noticed detainee MIGUEL ALBERTO RUIZ-ZAMORA was tearing up his mattress inside his cell in the Special Management Unit (“SMU”) of Golden State Annex and the DOs observed a scratch across his abdomen. RUIZ-ZAMORA requested to be assessed by medical staff and a five-man team of DOs entered the cell and restrained RUIZ-ZAMORA with hand restraints. Nurse M.C., a member of the Golden State Annex medical staff, responded and entered the cell at approximately 9:05 p.m. to conduct her medical assessment of RUIZ-ZAMORA. After Nurse M.C. completed her assessment and was about to leave the cell, RUIZ-ZAMORA reared back and kicked her in the upper chest area with his left foot, and Nurse M.C. was forced backwards into the cell’s doorframe. RUIZ-ZAMORA was restrained by the DOs and Nurse M.C. was escorted out of the SMU. Nurse M.C. was evaluated by medical staff at the facility and was

1 subsequently transported by ambulance to the local hospital emergency room for further assessment of
2 her sustained injuries.

3 6. I viewed surveillance video of the SMU area RUIZ-ZAMORA was housed in during this
4 incident, where I observed Nurse M.C. enter the cell and perform her assessment of RUIZ-ZAMORA
5 while his arms were restrained behind his back. Several DOs clad in riot gear were posted outside and
6 inside of the cell, two of which were restraining RUIZ-ZAMORA during his medical assessment. As
7 Nurse M.C. was backing out of the cell, RUIZ-ZAMORA adjusted his stance and kicked her in her
8 chest. The surveillance video showed Nurse M.C. thrown backwards from the force of the kick and her
9 back collided against the doorframe of RUIZ-ZAMORA's cell before she was pulled away by DOs.

10 7. Based on facts stated above, I believe RUIZ-ZAMORA assaulted Nurse M.C., a person
11 assisting federal officers or employees of the United States in federal services pursuant to a contract with
12 a federal agency. That is, he assaulted Nurse M.C. by striking her with his foot to her chest. I believe
13 RUIZ-ZAMORA violated Title 18, United States Code, Section 111(a)(1) - assaulting, resisting, or
14 impeding federal officers or persons assisting said officers in the performance of federal duties.

15
16 **CONCLUSION**

17 8. The above facts set forth probable cause to believe that MIGUEL RUIZ-ZAMORA is in
18 violation of 111(a)(1) - assaulting, resisting, opposing, impeding, intimidating, or interfering with any
19 person designated as or assisting an officer under section 1114 of Title 18. I request that an arrest
20 warrant be issued for Miguel RUIZ-ZAMORA for this violation.

21
22 
23 Jennifer Doyle
Special Agent, ICE OPR

24 Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by
25 telephone consistent with Fed. R. Crim. P. 4.1, 4(d), and 41(d)(3) this day **Feb 21, 2025**.

26
27 
28 Hon. Stanley A. Boone
United States Magistrate Judge

Reviewed as to form.

/s/ Calvin Lee

Calvin Lee

Assistant U.S. Attorney